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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

CESAR LOSOYA-CASTREJON,  
ARTURO FARIAS-ZEPEDA,  
ROBERTO SORIA-CUEVAS,  
RICARDO RIVAS ARREDONDO,  
JOSE ADAN CHAIDEZ OJEDA,  
  
Defendants.

CASE NO. 1:22-CR-00297-JLT-BAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: 3/27/2024  
TIME: 1:00 p.m.  
COURT: Hon. Barbara A. McAuliffe

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on 3/27/2024.

2. By this stipulation, defendant now moves to continue the status conference until 6/26/2024, and to exclude time between 3/27/2024, and 6/26/2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes thousands of pages of investigative reports, video, audio recordings, cell phone

extractions, and other voluminous materials. Supplemental discovery has been either produced directly to counsel or made available for inspection and copying. The government has extended formal plea offers and is engaged in plea negotiations.

b) Counsel for defendants desire additional time to consult with their clients, review the voluminous discovery, conduct independent investigation, and pursue a potential pretrial resolution of the case.

c) Counsel for defendants believe that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of 3/27/2024 to 6/26/2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Date: March 18, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ Antonio J. Pataca  
ANTONIO J. PATACA  
Assistant United States Attorney

1 Date: March 18, 2024

/s/ Victor M. Perez

VICTOR M. PEREZ

Counsel for Defendant

CESAR LOSOYA-CASTREJON

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4 Date: March 18, 2024

/s/ David Torres

DAVID TORRES

Counsel for Defendant

ARTURO FARIAS-ZEPEDA

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6 Date: March 18, 2024

/s/ Victor Chavez

VICTOR CHAVEZ

Counsel for Defendant

ROBERTO SORIA-CUEVAS

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10 Date: March 18, 2024

/s/ Mark King

MARK KING

Counsel for Defendant

RICARDO RIVAS-ARREDONDO

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14 Date: March 18, 2024

/s/ Patrick Aguirre

PATRICK AGUIRRE

Counsel for Defendant

JOSE ADAN CHAIDEZ-OJEDA

**ORDER**

IT IS SO ORDERED that the status conference is continued from March 27, 2024, to **June 26, 2024, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: March 19, 2024

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE